

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

NETLIST, INC.,)	
)	
Plaintiff,)	
)	Case No. 2:22-cv-293-JRG
vs.)	
)	JURY TRIAL DEMANDED
SAMSUNG ELECTRONICS CO., LTD.;)	(Lead Case)
SAMSUNG ELECTRONICS AMERICA,)	
INC.; SAMSUNG SEMICONDUCTOR)	
INC.,)	
)	
Defendants.)	

NETLIST, INC.,)	
)	
Plaintiff,)	
)	Case No. 2:22-cv-294-JRG
vs.)	
)	JURY TRIAL DEMANDED
MICRON TECHNOLOGY, INC.;)	
MICRON SEMICONDUCTOR)	
PRODUCTS, INC.; MICRON)	
TECHNOLOGY TEXAS LLC,)	
)	
Defendants.)	

**DECLARATION OF JASON G. SHEASBY IN SUPPORT OF NETLIST, INC.'S
OPPOSITION TO SAMSUNG'S DAUBERT MOTION TO STRIKE EXPERT
TESTIMONY OF DAVID KENNEDY**

I, Jason G. Sheasby, declare as follows:

1. I am an attorney at the law firm of Irell & Manella LLP, counsel of record for Plaintiff Netlist, Inc. (“Netlist”) in the above-captioned action. I am a member in good standing of the State Bar of California and have been admitted to practice *pro hac vice* before this Court in this action. I provide this declaration in support of Netlist, Inc.’s Opposition to Samsung’s *Daubert* Motion to Strike Expert Testimony of David Kennedy. I have personal knowledge of the facts stated herein, and could and would testify completely thereto if called as a witness in this matter.

2. Attached as **Exhibit 1** is a true and correct excerpted copy of Exhibit I to the November 20, 2023 Opening Expert Report of Dr. William Henry Mangione-Smith.

3. Attached as **Exhibit 2** is a true and correct excerpted copy of the transcript of the January 15, 2024 deposition of David Kennedy.

4. Attached as **Exhibit 3** is a true and correct excerpted copy of the transcript of the November 23, 2022 deposition of Sungjoo Park, taken in Civil Case No. 21-CV-463-JRG.

5. Attached as **Exhibit 4** is a true and correct excerpted copy of Exhibit A to the February 13, 2023 Opening Expert Report of Dr. William Henry Mangione-Smith, in Case No. 21-CV-463-JRG.

6. Attached as **Exhibit 5** is a true and correct excerpted copy of Exhibit C to the November 20, 2023 Opening Expert Report of Dr. William Henry Mangione-Smith.

7. Attached as **Exhibit 6** is a true and correct copy of Exhibit 1B to the Corrected Expert Report of Mr. David Kennedy, dated January 20, 2023, in Case No. 21-CV-463-JRG.

8. Attached as **Exhibit 7** is a true and correct excerpted copy of the December 21, 2023 Rebuttal Expert Report of Lauren R. Kindler.

9. Attached as **Exhibit 8** is a true and correct excerpted copy of November 20, 2023 Expert Report of John B. Halbert.

10. Attached as **Exhibit 9** is a true and correct copy of Attachment B to the November 20, 2023 Opening Expert Report of Joseph C. McAlexander III.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on January 30, 2024.

By /s/ Jason G. Sheasby

Jason G. Sheasby